From: Brooks, George P CIV Sent: Monday, June 11, 2018 1:27 PM To: Henderson, Kim/SDO; Janda, Danielle L CIV; Robinson, Derek J CIV NAVFAC HQ, BRAC PMO; Banister, Stephen D CIV NAVFAC SW; Macchiarella, Thomas L JR CIV NAVFAC HQ, BRAC PMO; Slack, Matthew L CIV SEA 04 04N; Liscio, Matthew P CIV SEA 04, NAVSEA DET RASO; Edwards, Zachary L CIV SEA 04 04N Cc: Scott Hay (shay@cabreraservices.com); Alejandro Lopez; Craig Bias (cbias@remwerks.com) **Subject:** RE: For Review: Revised Parcel G and Background Work Plans **Attachments:** Final Internal Draft Comments pb.docx Here are my final comments. Thanks everyone! Pat ----Original Message-----From: Henderson, Kim/SDO [mailto:Kimberly.Henderson@jacobs.com] Sent: Thursday, June 07, 2018 3:30 PM To: Janda, Danielle L CIV; Brooks, George P CIV; Robinson, Derek J CIV NAVFAC HQ, BRAC PMO; Banister, Stephen D CIV NAVFAC SW; Macchiarella, Thomas L JR CIV NAVFAC HQ, BRAC PMO; Slack, Matthew L CIV SEA 04 04N; Liscio, Matthew P CIV SEA 04, NAVSEA DET RASO; Edwards, Zachary L CIV SEA 04 04N Cc: Scott Hay (shay@cabreraservices.com); Alejandro Lopez; Craig Bias (cbias@remwerks.com) Subject: [Non-DoD Source] For Review: Revised Parcel G and Background Work Plans Hi All, Attached for your review are updated versions of the Parcel G and Background Work Plans (and a few Parcel G figures and a table) to address your comments. The text edits are in track changes and the comments are included with responses where applicable. Thanks! Kim Henderson, PG, LEED GA **Project Manager** D 1 619 272 7209 M 1 757 513 6632 CH2M is now Jacobs.

www.jacobs.com <a href="http://www.jacobs.com/">http://www.jacobs.com/>

NOTICE - This communication may contain confidential and privileged information that is for the sole use of the intended recipient. Any viewing, copying or distribution of, or reliance on this message by unintended recipients is strictly prohibited. If you have received this message in error, please notify us immediately by replying to the message and deleting it from your computer.

**Executive Summary:** 

Last sentence of Conceptual Site Model

"A determination as to whether contamination exists at the site cannot be made until additional data is collected, <u>analyzed</u>, and <u>compared to cleanup levels and background concentrations</u>.

Phase 1 Investigation

Recommend deleting the last paragraph as soil segregation does not appear elsewhere in the WP

Introduction

Fourth paragraph after (Navy 2009) insert "and"

Conceptual Site Model

Site Name

Former Hunters Point Naval Shipyard add "(Parcel G)" – this seems to have morphed into a Parcel G SCM

Uncertainties

Soil Investigation Design and Implementation

Step 2 input should probably include values for naturally-occurring and man-made background levels

Step 3 is an incomplete sentence.

Step 5, first bullet – "The RACR will describe the results of the investigation and will provide a demonstration that radioactivity levels meet the Parcel G RAO or represent background conditions.

Second bullet – "If the investigation results demonstrate that site conditions are not compliant with the Parcel G RAO and exceed background levels, then ......."

Step 6, 2<sup>nd</sup> sub bullet – "If any Ra-226 gamma spectroscopy concentration is greater than the RG, then the soil sample will be analyzed for U-238 and Ra-226 using comparable analytical methods (alpha spectroscopy). For that specific sample, the U-238 result will be used as a more representative estimate of the background value for Ra-226, and the alpha spectroscopy Ra-226 concentration will be compared to the RG using the revised background value.

Section 3.6.5 – "There is no durable cover associated with the Phase 1 SUs associated with surface soil from buildings sites." This is inconsistent with Step 7, second bullet, "For surface soil SUs, systematic samples will be collected from underneath the durable cover layer(s)." And a similar statement in the Executive Summary (Phase 2 Investigation).

Table 3.3 – It's not clear why SU-A, SU-B, and SU-C are in Phase 2 and the other Building 351A SUs are in Phase 1.

Section 3.3.1 – third paragraph – insert "and" after (226Ra daughter 214Bi),

Section 3.4 – Phase 1 includes radiological investigations of 14 of 28 SUs and Phase 2 includes the remaining 14 SUs in Parcel G. The number of Phase 2 SUs is not discussed in the Executive Summary or the DQOs. The Executive Summary indicates that Phase 1 is a gamma scan. Step 7 in the DQOs say Phase 1 includes both a gamma scan and soil sampling. Please ensure consistency.

Section 3.4.3 – what is a ubiquitous "constructed" radionuclide? Suggest changing to "man-made"

Section 3.4.5 - insert "and" after (226Ra daughter 214Bi),

Section 3.6.3 – Define ESU and SFU at first use of acronym

Section 3.6.3.1 –Most of this can be done on a RSY pad. Please describe the soil sorter objectively and eliminate the superlatives. This reads like a marketing brochure.

Section 3.6.3.2 – delete the second sentence. It is unnecessary as a thorough discussion follows.

Section 5.5 – change Z<sub>BRA</sub> to Z<sub>RBA</sub>